

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ABBIE MARTIN STEMPER,
[DOB: 5/2/73]

Defendant.

No. 16-04046-01-CR-C-BCW

COUNT 1

18 U.S.C. § 1343

NMT 30 Years Imprisonment

NMT \$1 Million Fine

NMT 5 Years Supervised Release:

Class B Felony

COUNT 2

18 U.S.C. § 1344

NMT 30 Years Imprisonment

NMT \$1 Million Fine

NMT 5 Years Supervised Release

Class B Felony

\$100 Special Assessment, Each Count

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

Introduction

At all times relevant:

1. **ABBIE MARTIN STEMPER** (“**STEMPER**”) worked as a bookkeeper and purchasing agent at Smith Paper & Janitorial Supply in Eldon, Missouri (“**SP&JS**”) from Spring of 2009 to February 2015.

2. **SP&JS** was a business which provides paper products and janitorial supplies.

3. **White Castle Service and Supply** (“**White Castle**”) was a wholly owned subsidiary of **SP&JS** located in Springfield, Missouri, and was also in the business of selling cleaning and janitorial supplies.

4. **SP&JS** had an account with Amazon, Inc., in which customers of **SP&JS** would purchase its products using its Amazon account, and Amazon would wire those payments into **SP&JS**’s bank accounts.

5. Amazon, Inc. is a corporation headquartered in Seattle, Washington, and does business in national and international commerce.

6. US Bank was a financial institution, the accounts of which were insured by the Federal Deposit Insurance Corporation (FDIC).

7. Regions Bank of Kansas City was a financial institution, the accounts of which were insured by the Federal Deposit Insurance Corporation (FDIC).

The Scheme and Artifice to Defraud

8. From an unknown date, but at least as early as in or about June 2010, and continuing to in or about February 2015, the defendant, **ABBIE MARTIN STEMPER**, devised and executed a scheme and artifice to defraud SP&JS, Regions Bank, Amazon, Inc. and US Bank, and to obtain money and property of SP&JS by means of false and fraudulent pretenses and representations.

9. It was an object of the scheme and artifice to defraud that **STEMPER** would unlawfully take and obtain, by deception and fraud, money belonging to SP&JS which was under the custody and control of Amazon, Inc., and to use the money for her own benefit.

10. It was an object of the scheme and artifice to defraud that **STEMPER** would unlawfully take, obtain and deposit, by deception and fraud, checks issued for product received by customers of SP&JS's subsidiary, White Castle, and deposit them to her personal account at Regions Bank.

11. It was part of the scheme and artifice to defraud that **STEMPER** would periodically change the "payment method" on SP&JS's Amazon Account Information Registration to cause payments received and held by Amazon, Inc. for SP&JS to be wired directly to **STEMPER**'s personal checking account at US Bank, thus diverting funds from going to SP&JS.

12. It was part of the scheme and artifice to defraud that **STEMPER** registered the fictitious business name “White Castle Service” with the State of Missouri, knowing that SP&JS had purchased a subsidiary named White Castle.

13. It was a part of the scheme and artifice to defraud that **STEMPER** added “DBA White Castle Service” to her personal checking account at Regions Bank in an effort to mislead Regions Bank into thinking that the deposits into her personal account of checks payable to SP&JS’s subsidiary, White Castle, were legitimate and to avoid detection.

14. It was further a part of the scheme and artifice to defraud that **STEMPER** would steal checks for payment of the products sold by SP&JS’s subsidiary, White Castle, and would deposit them to her personal account at Regions Bank.

15. It was further a part of the scheme and artifice to defraud that **STEMPER** would conceal her fraud and embezzlement by making one-sided false credit entries into individual customer accounts receivable accounts in SP&JS’s accounting system to falsely reflect payments in full or partial payments from customers.

COUNT 1
(Wire Fraud)
18 U.S.C. § 1343

16. Paragraphs 1 through 11 and 15 are incorporated herein by reference.

17. In support of the scheme and artifice to defraud and to obtain the money of SP&JS by false and fraudulent pretenses, the defendant, **ABBIE MARTIN STEMPER**, committed or caused to be committed the following act in execution of the scheme to defraud:

18. On or about July 18, 2014, in Eldon, in Miller County, in the Western District of Missouri, and elsewhere, the defendant, **ABBIE MARTIN STEMPER**, knowingly caused a wire transfer from an Amazon, Inc. account with Wells Fargo located in San Francisco, California, to **STEMPER**’s personal checking account at US Bank, in Eldon, Missouri, in the

amount of \$3,706.71; all in violation of Title 18, United States Code, Section 1343.

COUNT 2
(Bank Fraud)
18 U.S.C. § 1344

19. Paragraphs 1 through 9 and 12 through 15 are incorporated herein by reference.

20. In support of the scheme and artifice to defraud and to obtain the money of SP&JS by false and fraudulent pretenses, the defendant, **ABBIE MARTIN STEMPER**, committed or caused to be committed the following act in execution of the scheme to defraud:

On or about April 14, 2014, in Eldon, in Miller County, the Western District of Missouri, and elsewhere, the defendant, **ABBIE MARTIN STEMPER**, did knowingly add “DBA White Castle Service” as an account name to her personal checking account with the intent to mislead Regions Bank, and facilitate the deposit of checks intended for SP&JS into her personal checking account; all in violation of Title 18, United States Code, Section 1344.

Tammy Dickinson
United States Attorney

By /S/

Lawrence E. Miller
Assistant United States Attorney
Missouri Bar No. 35931